

DOW, LOHNES & ALBERTSON, PLLC
ATTORNEYS AT LAW

LAURA H. PHILLIPS
DIRECT DIAL 202-776-2824
lphillips@dlalaw.com

WASHINGTON, D.C.

1200 NEW HAMPSHIRE AVENUE, N.W. • SUITE 800 • WASHINGTON, D.C. 20036-6802
TELEPHONE 202-776-2000 • FACSIMILE 202-776-2222

ONE RAVINIA DRIVE • SUITE 1600
ATLANTA, GEORGIA 30346-2108
TELEPHONE 770-901-8800
FACSIMILE 770-901-8874

July 12, 2001

RECEIVED

JUL 12 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Magalie Roman Salas, Esq.
Secretary
Federal Communications Commission
The Portals
445 12th Street, SW
Washington, DC 20554

Re: Second Quarter 2001 Status Report - E911 TTY Implementation,
Triton PCS, Inc. and Triton PCS License Company, L.L.C.,
CC Docket No. 94-102

Dear Ms. Salas:

Pursuant to the Fourth Report and Order in CC Docket No. 94-102 ("Fourth R&O"), this letter provides a quarterly status report on the efforts by Triton PCS, Inc. and its licensee subsidiary, Triton PCS License Company, L.L.C. (collectively "Triton"), to implement E911 TTY compatibility on Triton's commercial wireless services networks. In the Fourth R&O, the Commission requested that carriers provide reports by the fifteenth of the month following the end of each calendar quarter detailing certain development, testing, and deployment activities. This letter is Triton's second E911 TTY report and covers activity during the second quarter of 2001.

Triton holds PCS licenses for markets in portions of North Carolina, South Carolina, Virginia, Kentucky, West Virginia, Georgia and Tennessee. Across all these markets, Triton's network utilizes LM Ericsson Telephone Co. ("Ericsson") TDMA infrastructure equipment. As a result, Triton is directly dependent upon Ericsson's development of TTY solutions that can be integrated into Triton's existing network.

During this quarter, Ericsson provided Triton with updated information regarding the status of its TTY/TDMA product development. Ericsson reported that its network infrastructure software development is continuing, and expects to begin a first order application trial in August 2001 with a major TDMA carrier. Assuming no significant problems arise, the software is anticipated to be generally available in mid-September 2001. Achievement of these timetables, however, assumes that there are no additional changes to the transcoder standards that are part of Ericsson's overall TTY network solution. Official adoption of Ericsson's transcoder standard has not yet occurred due to

No. of Copies rec'd 013
List A B C D E

the standard ballot close date slipping from mid-June to August of this year. Ericsson indicated to Triton that any additional changes to the standard may impact Ericsson's delivery schedule. Additional delays in having TTY capable handsets or terminals available for testing may also adversely affect Ericsson's network infrastructure software development and testing timetable.

Once Ericsson's TTY network infrastructure software solutions are available commercially, Triton will implement them in its network. With respect to handset availability, Triton does not manufacture handsets, and accordingly, must rely upon the efforts of the various handset manufacturers that develop and sell TTY compatible TDMA handsets. Additionally, until such time as Ericsson's switching software upgrades are available, Triton does not have the ability to test any manufacturer's handsets to evaluate their compatibility with TTY software and network operations.

In establishing its quarterly reporting requirement, the Commission requested that reporting carriers provide specific information on the following issues:

Development Activities

1. **Network Infrastructure Software Development.** As outlined above, Ericsson is Triton's infrastructure vendor across Triton's entire network and Triton remains in constant contact with Ericsson on TTY development issues. Ericsson has reported to Triton the following:

- Ericsson's network infrastructure software development continues.
- Ericsson will begin testing a TDMA TTY network product design IS-823-A in July. This design is based upon the minimum performance specifications standards identified by the April 20 version of IS-823-A, which is currently open for standard balloting.
- First order application testing of Ericsson infrastructure software with a major TDMA carrier is being negotiated for August 2001.
- General availability of software/switch upgrades is anticipated by mid-September 2001, but timetable may slip to allow time for redesign if the IS-823-A standard is changed from its current form.

2. **Handset Development And Testing Plans.** Handset development and testing is the responsibility of Triton's handset vendors/ manufacturers. As indicated above, Triton does not manufacture any handsets itself and must rely on the handset vendor's TTY development efforts. However, Triton has solicited and received status reports from three of its handset vendors indicating that TDMA handsets with TTY compatibility are anticipated to be available to carriers for testing later this year.

3. **Beta Testing And Lab Testing.** This testing will be completed by the handset vendors rather than carriers such as Triton.

4. Release And General Availability To Carriers Of Network Infrastructure Software. Triton will make use of Ericsson's network infrastructure software as soon as it is available commercially according to Ericsson's release schedule.

5. Availability To Carriers Of Full Acceptance Test Units. After compatible handsets are made available by Triton's handset manufacturers, and after the necessary Ericsson switch software upgrades are implemented, Triton will obtain test handset units for acceptance testing.

6. Efforts Toward Achieving Digital Wireless Solution Compatibility With Enhanced TTY Devices. These efforts are directly dependent on the efforts of Triton's infrastructure vendor, Ericsson, and upon Triton's handset vendors. After the necessary switch software upgrades are implemented and compatible handsets are available, Triton will take all steps within its control to comply with utilization of enhanced TTY devices that are compatible with the Ericsson TDMA platform that makes up its current network.

Testing and Deployment Activities

7. Carrier Coordination Of Testing With PSAPs. Triton intends to utilize its existing relationships with PSAPs to facilitate testing of TTY compatibility with E911 communications after the necessary switch software upgrades and compatible handsets are available.

8. Carrier Testing Activities, Including Field Testing, Consumer End-To-End Testing, And Other Necessary Tests. Until such a time as the necessary switch software upgrades are implemented and compatible handsets are available, Triton can only develop a thorough test plan to ensure full compliance with TTY compatibility requirements. Once software upgrades have been completed and handsets are made available, Triton will conduct tests to ensure achievement of TTY compatibility requirements.

9. Retail Availability Of Necessary Consumer Equipment. When TTY compatible consumer equipment becomes available, Triton will utilize its established chain of retail outlets, its Internet website and all other marketing sources to make TTY compatible equipment available to interested subscribers.

10. Geographic Scope Of Network Infrastructure Deployment. Triton intends to deploy TTY support capability and compatibility in its entire network once the necessary switch software is available from Ericsson, TTY enabled handsets are available from handset vendors, and adequate testing has taken place to ensure that the requirements of TTY compatibility are met. Triton cannot provide a date certain as to when each of these milestones will be achieved. However, it will continue to monitor the

Magalie Roman Salas, Esq.

July 12, 2001

Page 4

events that must occur prior to Triton's ability to test TTY performance on its network and will continue to report progress as required by the Commission.

Should any questions arise or if there is need for further information concerning this Triton status report, please contact the undersigned at (202)-776-2824.

Respectfully submitted,

A handwritten signature in black ink, reading "Laura Phillips". The signature is fluid and cursive, with the first name "Laura" and last name "Phillips" clearly distinguishable.

Laura H. Phillips

Counsel for Triton PCS, Inc.

cc: Glen Robinson, Senior Vice President, Engineering and IT
Pam Gregory, Disability Rights Office, FCC Consumer Information Bureau
Kris Montieth, FCC Wireless Telecommunications Bureau
Patrick Forster, FCC Wireless Telecommunications Bureau
Mindy Littell, FCC Wireless Telecommunications Bureau